

HONORABLE JUDGE JAMAL N. WHITEHEAD

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

MICHAEL WRIGHT and ALEXIS WRIGHT,
a married couple,

Case No. 2:23-cv-00179-JNW

Plaintiff,

VS.

STATE FARM FIRE & CASUALTY
COMPANY, a foreign insurer.

**DECLARATION OF HEATHER N.
DERENSKI IN SUPPORT OF
PLAINTIFFS' OPPOSITION TO
DEFENDANT'S MOTION TO SEAL**

[NOTE ON MOTION CALENDAR
DECEMBER 9, 2024]

1. I am over the age of eighteen and competent to testify. I am Plaintiffs' counsel in this case. This declaration is based on my personal knowledge.

2. I understood the documents filed as Dkt. No. 61-10 were provided to Plaintiffs' counsel in response to a request for public records from the *Gamble v. State Farm* 3:19-cv-05956-MJP trial. I reviewed the court's docket in the *Gamble* trial and reasonably believed that both "Exhibit 15" and "Exhibit 16" had been admitted as trial exhibits, prior to filing Dkt. No. 61-10. Any error in this belief was unintentional.

After receiving Defense counsel Hicks' challenge regarding the public availability of the documents and request to seal, I reviewed the court's record. When I could not locate a record

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SNOHOMISH, WA 98290
(425) 460-0080

1 regarding "Exhibit 16" which I previously believed I reviewed prior to filing Dkt. No. 61-10, I
2 contacted the court. The court informed me they would have someone respond to my inquiry. I
3 have not yet received a response. I was also unable to locate a document in the court's record
4 following the admittance of "Exhibit 15" that required the return or destruction of the documents.

5 Plaintiffs' counsel maintained the documents as confidential, and have not shared or
6 otherwise used the documents after the notification the documents were protected.
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8 Signed under penalty of perjury in Snohomish Washington December 4, 2024.
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11 s/Heather N. Derenski
12 Heather N. Derenski
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CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury under the laws of the State of Washington that on December 4, 2024, I caused one true copy of the foregoing document with exhibits to be served in the manner indicated below:

Attorney for Defendant
State Farm Fire & Casualty Company
James D. Hicks
SINARS SLOWIKOWSKI TOMASKA LLC
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Seattle, WA 98119
(206) 705-2115
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- U.S. Postal Service
- Facsimile
- E-Mail
- E-Service/ECF
- Hand Delivery
- Via Legal Messenger Service

DATED December 4, 2024, in Snohomish, Washington.

CEDAR VIEW LAW, PLLC

s/Heather N. Derenski
Heather N. Derenski, Attorney